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**March 17, 2005**

Ms. Marlene Dortch  
Secretary Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

RE: WT Docket 94-102

The Harwich (MA) Fire Department services 12,000 citizens year round. During the Summer months our population increases to 50,000 with visitors from all over the World. Our 9-1-1 Answering Point is located at the Barnstable County (MA) Sheriff's Office.

It is my humble opinion that the Commissioners should take into serious consideration the comments filed re: WT Docket 94-102 as filed by APCO International. Any ruling should insist that Carriers must demonstrate compliance with the average accuracy levels specified in the FCC rules. Please mandate that accuracy testing be done at the local community level. In the case of the Town of Harwich it should be at the level of Barnstable County to insure that we will have a minimum of errors in location reporting. I would also urge retesting on a periodic basis. It should be conducted at a minimum of every two years.

Our department has had situations in the past where a location error has resulted in both loss of life and increased loss of property. Location reporting is the number one critical item that should be identified by a 9-1-1 caller. If they are unable to report their whereabouts the technology will be there to ensure that the nearest proper service is provided in the shortest period of time.

I urge the Commissioners to insist on providing clear, unequivocal, guidance for the wireless industry to ensure that E9-1-1 caller location accuracy is as close to absolute as possible. Please insist on Carrier compliance at the local level.

Thank you for your attention to this matter.

Sincerely,

Joseph McNeil

Captain, Harwich (MA) Fire Department (Retired)

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